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Connected Dealer Services, LLC cares about your privacy. This privacy policy explains who we are, how we collect, share and use Personal Information, and how you can exercise your privacy rights.

We recommend that you read this privacy policy in full to ensure you are fully informed. To make it easier for you to review the parts of this privacy policy that apply to you, we have divided up the document into sections:

- Privacy for Organizations (Section 2)
- Privacy for Organization Customers and End Users (Section 3)
- Privacy for Website Visitors (Section 4)

If you have any questions or concerns about our use of your Personal Information, please contact us using the contact information provided at the end of Section 14.

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1. ABOUT US

Connected Dealer Services, LLC provides in-vehicle products and services and the Intercept Mobile Application (the “App”) to provide connected vehicle services (collectively “Services”). A reference to “CDS,” “we,” “us” or the “Company” is a reference to Connected Dealer Services, LLC and its relevant affiliates involved in the collection, use, sharing, or other processing of Personal Information.

2. PRIVACY FOR ORGANIZATIONS

This section applies to the Personal Information we collect and process from our customers who are dealers, licensees, and partners (collectively “Organizations”) that use our connected vehicle Services to manage their vehicle fleets and provide dealership, repair, maintenance, and other services to their customers and end users. If you are not an Organization, the other sections of this policy may be more applicable to you and your data. In this section, "you" and "your" refer to Organizations.

a. Information We Collect

The Personal Information that we may collect broadly falls into the following categories:

Information You Give Us. You may give us information about you. Personal Information is often, but not exclusively, provided to us when you sign up for and use the Services, consult with our customer service team, send us an email, integrate the Services with another website or service, or communicate with us in any other way. The categories of information include:

- Identifiers such as real name, address, email address, phone number, company, job title;
- Personal information under [California Civil Code section 1798.80](#);
- Commercial information such as purchases of the Services;
- Internet or other electronic network activity information, such as IP address and browser type;
- Professional or employment-related information such as job title and company name; and,
- Inferences drawn from any of the above information categories.

Information We Automatically Collect. Like many website and App operators, we collect information that your browser or device sends whenever you visit our website and App. We use cookies and other tracking technologies to collect some of this information. Learn more in our Cookies section below.

The categories of information include:

- Device information: We collect information about the device and applications you use to access the Services and the App, such as your IP address, your operating system, your location, your browser ID, and other information about your system and connection.
- Log data: Our web servers keep log files that record data each time a device accesses those servers and those log files contain data about the nature of each access, including originating IP addresses. We may also access metadata and other information associated with files that you upload into our Services.
- Product usage data: We collect usage data about you whenever you interact with our Services and App, which may include the dates and times you access the Services and the

App and your browsing activities (such as what portions of the Services and App are used). We also collect information regarding the performance of the Services and App.

Information We Collect From Third Parties. From time to time, we may obtain information about you from third-party sources, such as public databases, and third-party data providers.

b. How We Use the Personal Information

We may use the Personal Information we collect through the Services or other sources for a range of reasons, including:

- To provide you with the Services.
- To communicate with you about your account and provide customer support.
- To market our products and/or services to you.
- Through our website cookies, which you may manage through our cookie banner, to share with third-party marketing platforms to provide tailored advertising on our websites and other websites that you may visit.
- To analyze website and App usage and improve the services offered.
- For market research, project planning, troubleshooting problems.
- For detecting and protecting against error, fraud or other criminal activity.
- To enforce compliance with our Terms and applicable law, and to protect the rights and safety of our customers and third parties, as well as our own. This may include developing tools and algorithms that help us monitor the use of our Services and prevent violations.

c. How We Share the Personal Information.

Affiliates and Service Providers. We share your information with our third-party service providers and any subcontractors as required to offer you our products and services. These service providers are under a duty of confidentiality.

Third Party Links and websites. Our website may contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any data to these websites.

Third Party Marketing and Advertising Organizations. Through website cookies, which you may manage through our cookie banner, we share your information with third party marketing and advertising partners, to provide tailored advertising on our Sites and other websites that you may visit.

Disclosures Required by Law. We may be required to disclose your data in response to lawful requests by public authorities, including to meet law enforcement requirements. We may be under a duty to disclose or share your Personal Information to comply with any legal obligation, to enforce or apply our Terms and other agreements, to protect our rights, property, or safety, or to protect the rights, property, or safety of others. This includes exchanging information with other companies and organizations for the purposes of fraud protection.

3. PRIVACY FOR ORGANIZATION CUSTOMERS AND END USERS

This section applies to the Personal Information we collect and process from Organization Customers and End Users. These terms have the following meanings:

- In connection with a vehicle sale, lease, rental, or other Organization services, our Organization Customers (e.g. dealerships, licensees, and partners), may provide us with an individual's Personal Information in connection with the vehicle and Organization information. These individuals are considered the "Organization Customers".
- An "End User" is an individual that opts-in to our connected vehicle services directly through the Intercept Mobile App. Organizations may have Organization Customers who are also End Users.

If you are an Organization Customer, please note that we received your information from an Organization, and the Organization may use and share your Personal Information for its own purposes. We encourage you to refer to the Organization's privacy policy for more information on how your Organization uses and shares your data.

a. Information We Collect

The Personal Information that we may collect broadly falls into the following categories:

Information You Give Us. You may choose to give us information about you directly. You may provide us information in the following ways:

- By using our App and Services.
- By contacting our customer service team.
- By contacting us directly through a webform, email, social media message, or otherwise submit inquiries through our websites.

The categories of information include:

- Identifiers such as real name, address, email address, job title, company, or phone number;
- Personal information under [California Civil Code section 1798.80](#);
- Information about your vehicle, including but not limited to license plate number, vehicle identification number (VIN), mileage, oil/battery status, fuel or charging history, electrical system function, and diagnostic trouble codes;
- Electronic, visual, and similar information about the use of your vehicle, including operational and safety related information, speed, crash detection alerts, impact data, braking and swerving/cornering events, vehicle direction (heading), camera image and sensor data, and security/theft alerts;
- Commercial information and information about your vehicle such as your vehicle purchases, rentals, repairs, and check-ins;
- Internet or other electronic network activity information; and,
- Inferences drawn from any of the above information categories.

Sensitive categories of information include:

- Geolocation data such as your vehicle GPS location.
- Login information such as your username, password, and/or PIN.

Information We Automatically Collect. Like many website operators, we collect information that your browser sends whenever you visit our website. We use cookies and other tracking technologies to collect some of this information. Learn more in our Cookies section below.

The categories of information include:

- **Device information:** We collect information about the device and applications you use to access the App and Services, such as your IP address, your operating system, your location, your browser ID, and other information about your system and connection.
- **Log data:** Our web servers keep log files that record data each time a device accesses those servers and those log files contain data about the nature of each access, including originating IP addresses. We may also access metadata and other information associated with files that you upload into our App and Services.
- **Product usage data:** We collect usage data about you whenever you interact with our App and Services, which may include the dates and times you access the Services and your browsing activities (such as what portions of the Services are used). We also collect information regarding the performance of the Services.

Information We Collect From Third Parties. From time to time, we may obtain information about you from third-party sources, such as public vehicle databases and third-party data brokers.

b. How We Use the Personal Information.

We may use the Personal Information we collect about Organization Customers and End Users for a range of reasons, including:

- To offer our App and Services to you and our Organizations.
- To share your information with Organizations that may be of interest to you.
- To communicate with you and provide customer support.
- To evaluate and improve the quality, safety, and security of our App and Services.
- To develop new products and services.
- Through our website cookies, which you may manage through our cookie banner, to share with third-party marketing platforms to provide tailored advertising on our websites and other websites that you may visit.
- To market our products and/or services to you.
- To analyze website usage and improve the services offered.
- For market research, project planning, troubleshooting problems.
- For warranty administration and validation.
- To provide product and service updates.
- To verify eligibility for vehicle purchase or incentive programs.
- For detecting and protecting against error, fraud or other criminal activity.
- To enforce compliance with our Terms and applicable law, and to protect the rights and safety of our customers and third parties, as well as our own. This may include developing tools and algorithms that help us monitor the use of our App and Services and prevent violations.

c. How We Share the Personal Information.

Organizations. If you are an Organization Customer, we share Personal Information collected from you and your vehicle with the relevant Organization. If you are an End User that has directly opted into our App and Services, we also share Personal Information collected from you and your vehicle with your Organization and other Organizations that may be of interest to you.

Emergency Service Providers: We share your Personal Information with emergency service providers, such as law enforcement to deliver related Services (for example, Stolen Vehicle Recovery Services).

Affiliates and Service Providers. We share your information with our third-party service providers and any subcontractors as required to offer you our products and services. These service providers are under a duty of confidentiality.

Third Party Marketing and Advertising Organizations. Through website cookies, which you may manage through our cookie banner, we share your information with third party marketing and advertising partners to provide tailored advertising on our Sites and other websites that you may visit.

Third Party Links and websites. Our website may contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any data to these websites.

Social Media. Our website may include social media buttons or widgets (“social media elements”). These social media elements may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media elements are governed by the privacy policy of the social media company providing the feature and/or widget.

Disclosures Required by Law. We may be required to disclose your data in response to lawful requests by public authorities, including to meet law enforcement requirements. We may be under a duty to disclose or share your Personal Information in order to comply with any legal obligation, to enforce or apply our Terms and other agreements, to protect our rights, property, or safety, or the protect the rights, property, or safety of others. This includes exchanging information with other companies and organizations for the purposes of fraud protection.

Deidentified and Aggregate Data. We may share deidentified and aggregate data with third parties to analyze sales and customer trends. This data cannot be reasonably identified to an individual and is not Personal Information.

4. PRIVACY FOR WEBSITE VISITORS

This section applies to Personal Information that we collect and process through our websites and in the usual course of our business, such as in connection with our sales and marketing activities, recruitment, and events. In this section "you" and "your" refers to website visitors.

a. Information We Collect.

The Personal Information that we may collect broadly falls into the following categories:

Information You Give Us. If you are a website visitor, you may choose to give us information about you directly. You may provide us information in the following ways:

- By contacting us directly through a webform, survey, email, social media message, or by otherwise submitting inquiries through our websites.
- By attending our events or other business interactions and providing your contact details.
- By entering into our sweepstakes or drawings.
- By applying for a role with us.

The categories of information include:

- Identifiers such as name, email address, job title, company, or phone number.
- Internet or other electronic network activity information;
- Employment information and job history for individuals who apply for a role with us; and
- Inferences drawn from any of the above information categories.

Information We Automatically Collect. Like many website operators, we collect information that your browser sends whenever you visit our website. We use cookies and other tracking technologies to collect some of this information. Learn more in our Cookies section below.

The categories of information include:

- Device information: We collect information about the device and applications you use to access the websites, such as your IP address, your operating system, your browser ID, and other information about your system and connection.
- Log data: Our web servers keep log files that record data each time a device accesses those servers and those log files contain data about the nature of each access, including originating IP addresses.

We generally collect this information in the aggregate to improve the performance of our websites. We do not associate this information with you or your computer, unless we need to investigate a violation of our Terms.

b. How We Use the Personal Information

We may use the Personal Information we collect for a range of reasons, including:

- Through website cookies, which you may manage through our cookie banner, we share your information with third-party marketing platforms to provide tailored advertising on our websites and other websites that you may visit.
- To market our products and/or services to you.
- To analyze website usage and improve the services offered.
- For market research, project planning, troubleshooting problems.
- For detecting and protecting against error, fraud or other criminal activity.
- To enforce compliance with our Terms and applicable law, and to protect the rights and safety of our customers and third parties, as well as our own. This may include developing tools and algorithms that help us monitor the use of our Services and prevent violations.

c. How We Share the Personal Information.

Affiliates and Service Providers. We share your information with our third-party service providers and any subcontractors as required to offer you our products and services. These service providers are under a duty of confidentiality.

Third Party Marketing and Advertising Organizations. Through website cookies, which you may manage through our cookie banner, we share your information with third party marketing and advertising partners, such as Google, to provide tailored advertising on our websites and other websites that you may visit.

Third Party Links and websites. Our websites may contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any data to these websites.

Social Media. Our website may include social media buttons or widgets (“social media elements”). These social media elements may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media elements are governed by the privacy policy of the social media company providing the feature and/or widget.

Disclosures Required by Law. We may be required to disclose your data in response to lawful requests by public authorities, including to meet law enforcement requirements. We may be under a duty to disclose or share your Personal Information in order to comply with any legal obligation, to enforce or apply our Terms and other agreements, to protect our rights, property, or safety, or the protect the rights, property, or safety of others. This includes exchanging information with other companies and organizations for the purposes of fraud protection.

5. YOUR PRIVACY CHOICES

a. General

Marketing Opt-Out: We may use your Personal Information to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe instructions provided in any email we send. You will continue to receive service-related messages concerning our Services.

Exercising Your Privacy Rights: We have listed the privacy rights for several jurisdictions below, but we understand you may have additional rights in your jurisdiction. You may contact us directly at any time about exercising your data protection rights. We will consider your request in accordance with applicable laws. We may ask you to verify your identity in order to help us respond efficiently to your request.

Please note that if you are an Organization Customer, we may also refer your privacy request to the relevant Organization.

b. Additional Disclosures for Certain U.S. State Residents

Third Party Marketing. California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your Personal Information to third parties for the third parties' direct marketing purposes. Please contact us at the contact information below to make a request.

Privacy Rights. Several jurisdictions grant state residents certain rights, including the right to access specific types of Personal Information, the right to learn how we process Personal Information, the right to know whether and how we disclose or sell Personal Information, the right to correct Personal Information, the right to opt out of any sale of Personal Information or limit the use of Sensitive Personal Information, the right to request deletion of Personal Information in certain circumstances, and the right not to be denied goods or services for exercising these rights. To make such a request, please contact us at the contact information below.

Do Not Sell My Personal Information. We are not data brokers and we do not sell your personal information on the open market. However, in some jurisdictions, some of the ways we share information may constitute a "sale."

- If you are an End User that has directly opted into our App and Services, we share Personal Information collected from you and your vehicle with your Organization and other Organizations that may be of interest to you. To opt out of such sharing, please contact us at the contact information below or submit a request online.

6. INTERNATIONAL TRANSFERS

Any data that you provide to us may be accessed, shared, or processed by our offices, located in the United States, and service providers located in the United States. This may entail a transfer of your personal information across international borders. The data protections standards may differ and be lower than the standards enforced in your jurisdiction.

7. CHILDREN'S PRIVACY

Our App and websites are not directed at individuals under the age of 16. We do not knowingly collect personal information from children under 16. If you become aware that a child has provided us with personal information, please contact us using the contact details provided in the "Contact Information" section below. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information.

8. DO NOT TRACK

Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. We do not recognize or respond to browser-initiated DNT signals, as the Internet industry is currently still working toward defining exactly what DNT means, what it means to comply with DNT, and a common approach to responding to DNT.

9. COOKIE POLICY

To make our websites and services work properly, we sometimes place small data files called cookies on your device. A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences over a period of time, so you do not have to keep re-entering them whenever you come back to the site or browse from one page to another.

Google Analytics. We use Google Analytics. We use the information we get from Google Analytics to improve the Sites. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Please refer to Google's [Privacy Policy](#) for more information. You may also choose to download the [Google Analytics opt-out browser add-on](#).

Email Campaigns. We may also place cookies in our emails to measure the effectiveness of our email campaigns by identifying the individuals who open or act upon an email message, when an email message is opened, how many times an email message is forwarded, the type of software, device, operating system and browser used to deliver the email and any URL accessed through our email message.

You may wish to restrict the use of cookies. Please be aware that some of the features of our website may not function correctly if you disable cookies.

Most modern browsers allow you to change your cookie settings. You can usually find these settings in the options or preferences menu of your browser. To understand these settings, the following links for commonly used browsers may be helpful:

- [Cookie settings in Chrome](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Safari web](#) and [iOS](#)

Personalized Advertising. We also use advertising cookies, such as Google Ads, to deliver tailored advertising on our Sites and other websites that you may visit. You can learn more about how to control advertising cookies by visiting the Network Advertising Initiative's Consumer Opt-Out [link](#), the DAA's Consumer Opt-Out [link](#) for browsers, or the DAA's opt-out [link](#) for mobile devices. Please note that electing to opt-out will not stop advertising from appearing in your browser or applications and may make the ads you see less relevant to your interests.

10. CHANGE OF CONTROL

Personal information may be transferred to a third party as a result of a sale, acquisition, merger, reorganization or other change in control. If we sell, merge or transfer any part of the business, part of the sale may include your Personal Information.

11. DATA RETENTION

We may retain your Personal Information for a period of time consistent with the original purpose of collection or as long as required to fulfill our contractual or legal obligations. We determine the appropriate retention period for Personal Information on the basis of the amount, nature, and sensitivity of the Personal Information being processed, the potential risk of harm from unauthorized use or disclosure of the Personal Information, whether we can achieve the purposes of the processing through other means, and on the basis of applicable legal requirements (such as applicable statutes of limitation).

After expiry of the applicable retention periods, your Personal Information will be deleted. If there is any data that we are unable, for technical reasons, to delete entirely from our systems, we will implement appropriate measures to prevent any further use of or access to such data.

12. SECURITY PROTECTIONS

We implement a variety of security measures to maintain the safety of your personal information when you enter, submit, or access your personal information. For example, when possible, we use encryption to transfer and store data. We further limit access to this data using access controls and confidentiality commitments.

However, no website, application, or transmission can guarantee security. Thus, while we have established and maintain what we believe to be reasonable procedures to protect the confidentiality, security, and integrity of personal information obtained through the websites, we cannot ensure or warrant the security of any information you transmit to us.

13. POLICY CHANGES

We may change this privacy policy at any time and from time to time. The most recent version of the privacy policy is reflected by the date located at the top of this privacy policy. All updates and amendments are effective immediately upon notice, which we may give by any means, including, but not limited to, by posting a revised version of this privacy policy or other notice on the websites. We encourage you to periodically review this Privacy Policy to ensure you are familiar with the most current version.

14. CONTACT INFORMATION

If you have questions or comments about this policy, you may email us at info@getintercept.com.